

# **Preston Park Primary School**

## **Safeguarding Policy**

September 2021

# Safeguarding Policy 2021 - 2022

## Preston Park Primary School

Learning Today, Leading Tomorrow



### Our Why

Our children have the right to a world class education  
Our children have the right to be safe  
Our children have the right to be valued as an individual  
Our children have the right to play  
Our children have a voice

### Our Vision

We are safe, happy and kind at Preston Park  
We ignite a love of learning that will last a lifetime  
We are curious learners confident to take risks  
We are world changers!



### Our Values

Resourceful  
Reflective  
Responsibility  
Resilient  
Reciprocity  
Respect

**Our vision, our values and our rights underpin all our policies; the education we deliver and are core to all our work.** Article 3 of the United Nations Convention on the Rights of the Child states that: **The best interests of the child must be a top priority in all decisions that affect children. This policy has been created with this in mind to keep the children at Preston Park safe, happy and with a love for learning.**

Statutory Policy		
Last review	Reviewed	Next Review
September 2021	Annually	September 2022

Please read this guidance carefully

WHO TO CONTACT IF YOU HAVE A SAFEGUARDING CONCERN:



## Preston Park Primary School

### Safeguarding Team

If you have any concerns about the safety or welfare of a child or a family, please speak to one of us or Brent Local Safeguarding Children Board on 020 8937 4300



S. Ali  
Designated Safeguarding Lead



G. Nutton  
Deputy Designated Safeguarding Leads



K. Angelou  
Deputy Designated Safeguarding Leads



J. Kaur  
SLT Safeguarding Team

Designated Safeguarding Governor – Marie Cusack

Role	Name	Contact Details
Deputy Headteacher – Designated Safeguarding Lead	Siobhan Ali	020 8904 3602
Headteacher – Deputy Safeguarding Lead	Georgina Nutton	020 8904 3602
Pastoral Manager – Deputy Safeguarding Lead	Karina Angelou	020 8904 3602
Assistant Headteacher - SLT safeguarding Team	Jaspreet Kaur	020 8904 3602
Nominated governor for safeguarding	Marie Cusack	mcusack3.304@lgflmail.org
Designated Officer (Local Authority, Brent)	Family Front Door Team	020 8937 4300

**Chair of Governors:** Marie Cusack

**Headteacher:** Georgina Elizabeth Nutton

**Deputy headteacher:** Siobhan Ali

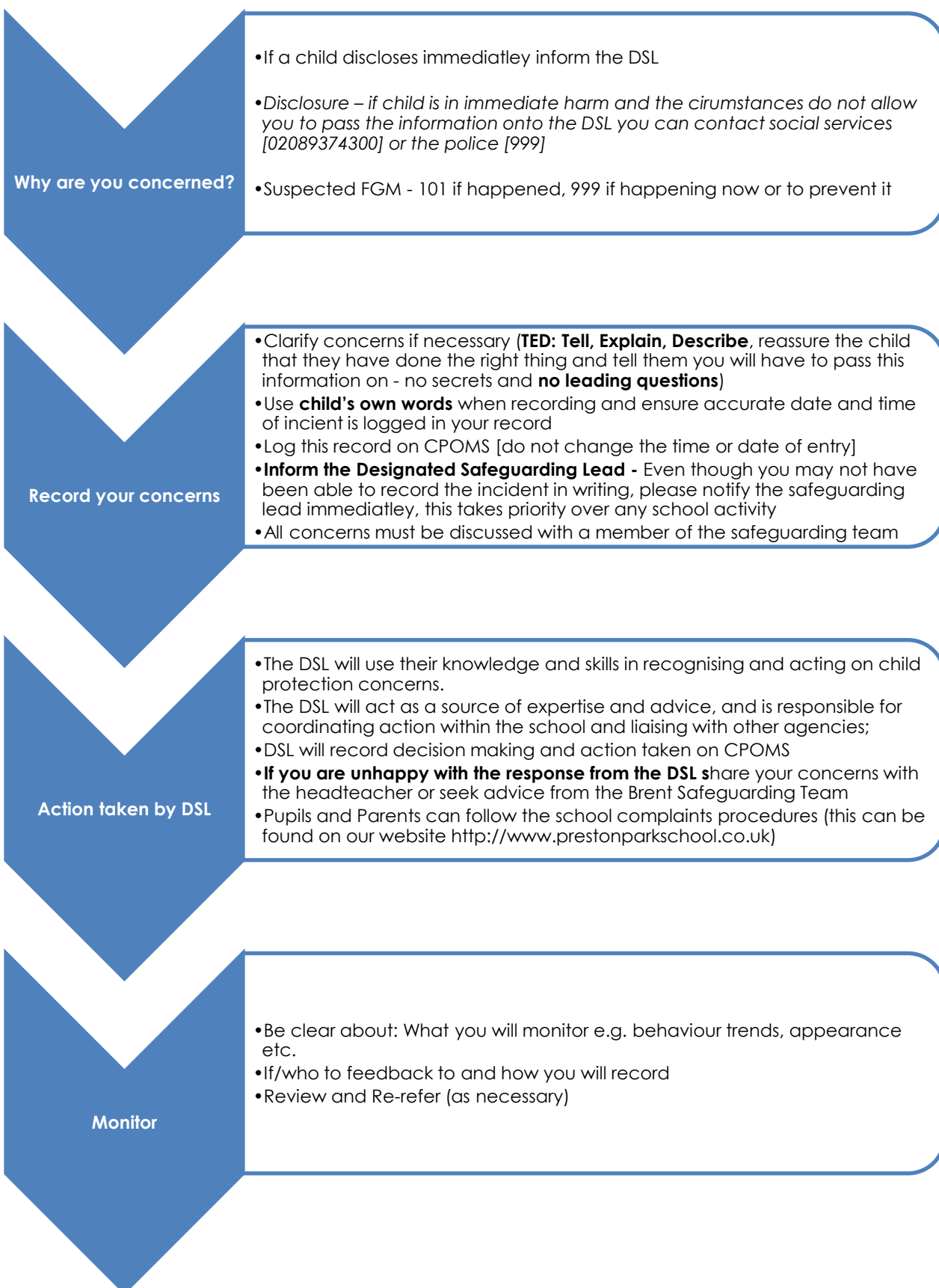
**Assistant Headteacher:** Jaspreet Kaur

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# What to do if you have a concern about a child





## Introduction

We are **safe**, happy and kind at Preston Park.

Preston Park Primary School is a community and safeguarding children is **everyone's** responsibility.

We all have an essential role to play in making Preston Park safe and secure. Everyone who comes into contact with children and families has a role to play in safeguarding children.

Preston Park recognises the importance of providing an ethos and environment within school that will help children to feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. The safety and well-being of the children is our highest priority in all aspects of the school's work.

The governing body ensures Preston Park will safeguard and promote the welfare of pupils and work together with other agencies to ensure that our school has adequate arrangements to identify, assess and support those children who are suffering or likely to suffer harm.

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

## Principles

Our schools core safeguarding principles are:

- It is a whole school responsibility to safeguard and promote the welfare of children as its paramount concern
- All children (defined as those up to the age of 18) regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All children have a right to be heard and to have their wishes and feelings taken into account
- All staff understand safe professional practice and adhere to our code of conduct and other associated policies
- All staff have a responsibility to recognise vulnerability in children and act on any concern in accordance with this guidance

## Key elements to our safeguarding policy

There are four key elements to our safeguarding policy:

**Prevention** (e.g. positive, supportive, safe school culture, curriculum and pastoral opportunities for children, safer recruitment procedures);

**Protection** (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns);

**Support** (for all pupils, parents and staff, and where appropriate specific intervention for those who may be at risk of harm);

**Working with parents and other agencies** (to ensure appropriate communications and actions are undertaken).

## The legal framework

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children](#), and the [Governance Handbook](#). We comply with this guidance and the procedures set out by our local safeguarding children board.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- Statutory [guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) Regulations 2009](#) (and [2018 amendment](#)) and [Childcare Act 2006](#), which set out who is disqualified from working with children

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

London Child Protection and Safeguarding Procedures – Brent LSCB

## Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers

## Definitions

**Abuse**, including neglect, is a form of maltreatment. A person may abuse or neglect child by inflicting harm or by failing to prevent harm. Children may be abused within their family, in an institutional or community setting, by those known to them, or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

**Children** are any people who have not yet reached their 18th birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger.

**Child protection** is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm.

**Early help** means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years to teenage years.

**Harm** is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.

**Safeguarding children** is the action we take to promote the welfare of children and protect them from harm. Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children as:

- protecting children from maltreatment;
- preventing impairment of children's health and development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes.

**Significant harm** is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 31 of the Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child.'

**Abuse of trust** All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach. In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

## Roles and Responsibilities

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including the staff Code of Conduct, the role of the designated safeguarding lead (DSL), the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation

## **The Designated Safeguarding Lead (DSL)**

**Our DSL is Siobhan Ali, Deputy Headteacher.** The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

When the DSL is unavailable, the **Deputy Designated Safeguarding Leads: Georgina Nutton, Headteacher and Karina Angelou, Pastoral Manager** will be on duty.

At Preston Park Primary School, we have a team of Designated Safeguarding Leads (DSL) and all members of the Senior Management Team are trained to deputise in the absence of a DSL to ensure there is appropriate cover for this role at all times. The DSL's responsibilities are described in Appendix A, and has a specific safeguarding job description.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The Deputy DSL's will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

## **The governing board**

The governing board will approve this policy at each review, and hold the headteacher to account for its implementation.

The governing board will appoint a senior board level (or equivalent) lead - Marie Cusack to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate.

## **The headteacher**

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction

- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person

At Preston Park **all teachers** are responsible for promoting the educational achievement of children who are looked after and our **designated lead** works with the **Virtual Preston Park Head** to discuss how available funding can be best used to support the progress of looked after children and meet the needs identified in the child's personal education plan.

## Safeguarding Training

All staff members will receive annual safeguarding and child protection training (organised by the DSL) which will enable them to:

- **Recognise** potential safeguarding and child protection concerns involving pupils and adults (colleagues, other professionals and parents/carers)
- **Respond** appropriately to safeguarding issues and take action in line with this policy
- **Record** concerns in line with the school policies
- **Refer** concerns to the DSL and be able to seek support external to the school if required

There will also be additional training in specific areas throughout the year e.g. annual PREVENT training, online safety, safer handling, safer recruitment for SLT.

## Supporting Children

At Preston Park we will support all pupils by:

- recognising that Preston Park may be the only stable, secure and predictable element in some of our children's lives.
- ensuring the content of the curriculum is relevant and includes social and emotional aspects of learning and the promotion of British Values;
- ensuring a comprehensive curriculum response to online-safety, enabling children and parents to learn about the risks of new technologies and social media and to use these responsibly;
- ensuring that child protection is included in the curriculum to help children stay safe, recognise when they do not feel safe and identify who they might or can talk to;
- providing pupils with a number of appropriate adults to approach if they are in difficulties;
- supporting the child's development in ways that will foster security, resilience, confidence and independence;
- encouraging development of self-esteem and self-assertiveness;
- ensuring any hate incidents, e.g. racist, homophobic or gender- or disability-based bullying, are considered under child protection procedures;
- liaising and working together with other support services and those agencies involved in safeguarding children;
- monitoring children who have been identified as having welfare or protection concerns and providing appropriate support.
- ensuring that all staff are aware of the early help process, and understand their role in it, including acting as the lead professional where appropriate.
- ensuring that all staff understand the additional safeguarding issues of children with special educational needs and disabilities and how to address them
- monitoring attendance patterns and reviewing and responding to them as part of welfare and protection procedures.

## Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

## Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Siobhan Ali, Deputy Headteacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

## Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

All staff should:

- Reassure victims that they are being taken seriously and that they will be supported and kept safe. They shouldn't be given the impression they are creating a problem or made to feel ashamed for making a report
- Know the indicators of abuse and neglect for specific safeguarding issues such as child criminal exploitation and child sexual exploitation
- Be vigilant as multiple safeguarding issues will overlap with one another
- Be aware of the risk factors that increase the likelihood of involvement in serious violence

## If a child is in immediate danger

Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.** Tell the DSL as soon as possible if you make a referral directly.

<https://www.brent.gov.uk/firmstep/forms/childrens-social-care-referral-form-for-professionals/>

## What to do if a child makes a disclosure to you

Our role at Preston Park is that of approachable adults and not as investigators. We observe, note and date any concerns and report to the Designated Safeguarding Lead.

If you are in a situation where a child discloses to you:

- **Listen carefully to the child and believe them.** Allow them time to talk freely and do not ask leading questions. Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause the child to 'shut down', retract or stop talking. Allow the child to talk freely.
- **Clarify concerns if necessary** being careful not to ask any questions.
  - Use the **TED** technique: **T**ell, **E**xplain, **D**escribe.
- **Let them know they've done the right thing.** Reassurance can make a big impact on the child who may have been keeping the abuse secret.
- **Tell them it's not their fault.** Abuse is never the child's fault and they need to know this.
- **Say you believe them.** A child could keep abuse secret in fear they won't be believed. They've told you because they want help and trust you'll be the person to believe them and help them.
- **Explain what you'll do next. Never promise to keep it a secret.** If age appropriate, explain to the child you'll need to report the abuse to someone who will be able to help.
- **Inform a DSL that there has been a disclosure**

- **Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Refer to your up-to-date training and find a member of the safeguarding team who can help you through the reporting stage. Upload to CPOMS** and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so
- **Seek support if you feel distressed.**

## Reporting on CPOMS

All disclosures must be reported to a member of the Designated Safeguarding Team immediately and recorded appropriately.

At Preston Park we use CPOMS; a child protection online management system to record our safeguarding concerns. When you log your concern on CPOMS, **do not change** the date and time. You can record the date and time of the disclosure within your report.

Your CPOM report must include:

- The name of the pupil
- Any other linked students
- When and where the disclosure/ incident/ concern took place
- What the child said (using the child's words)
- What you said to the child
- The names of any other staff or pupils who witnessed the incident/ disclosure/ concern;
- Any action you have taken

## FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

**Any teacher** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

The duty above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

**Any member of staff** who suspects a pupil is *at risk* of FGM must speak to the DSL and follow our local safeguarding procedures reporting to the police on 101.

## If you have concerns about a child (as opposed to a child being in immediate danger)

Figure 1 (Page 16), illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly.

You can also contact the charity **NSPCC on 0808 800 5000** if you need advice on the appropriate action.

### Early help

If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

A child may also benefit from early help – if they have: health conditions, a mental health need, a family member in prison or affected by parental offending, a risk of honour-based abuse such as female genital mutilation (FGM) or forced marriage, and persistent absence from education (including absences for part of the day).

### Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure

the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

## Extremism

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

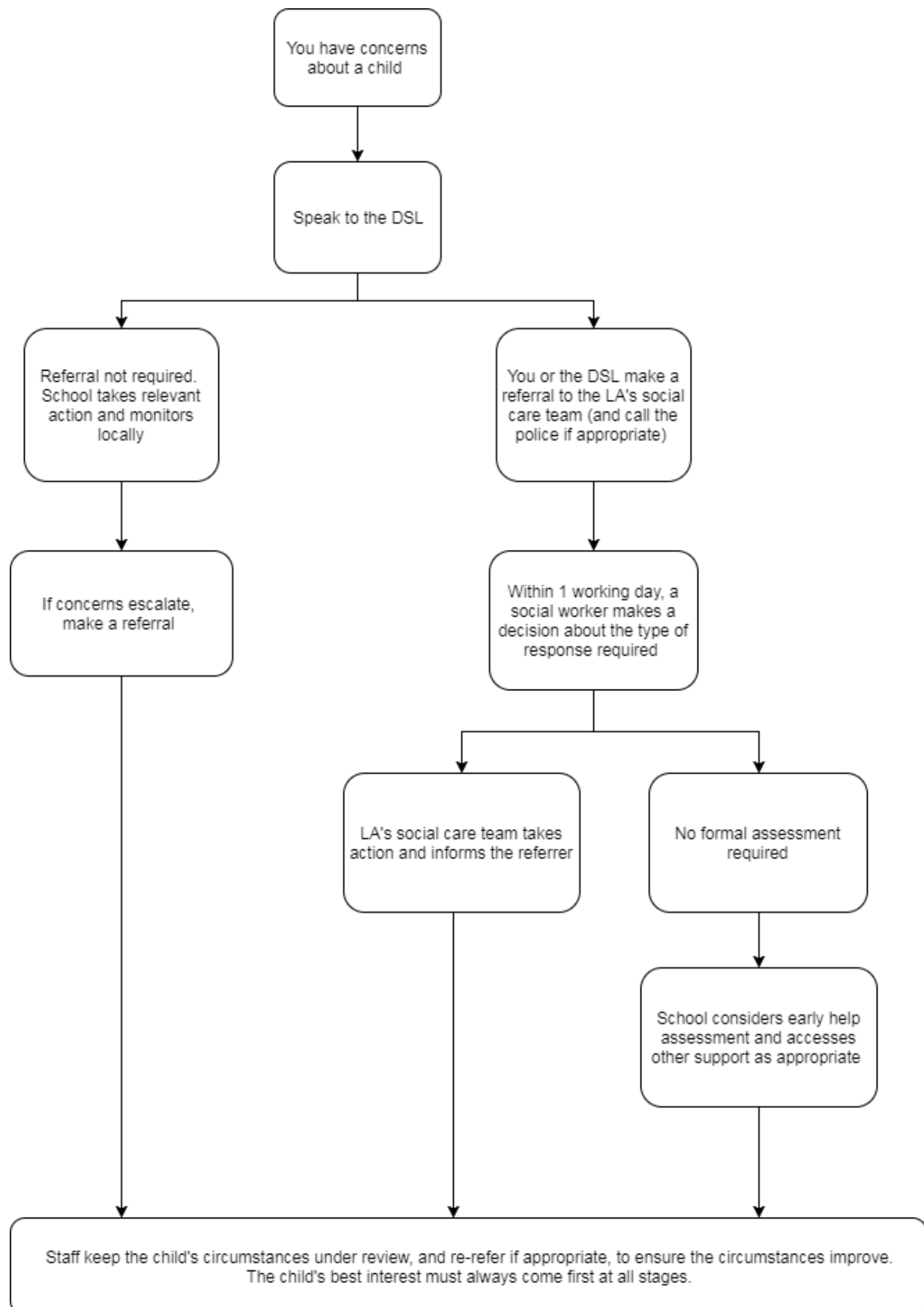
The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In a non-emergency, call **101** or the confidential anti-terrorist hotline on **0800 789 321** if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

In an emergency, always call **999**.

Figure 1: procedure if you have concerns about a child's welfare (no immediate danger)



## Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, speak to the headteacher. If you have concerns about the headteacher, speak to the chair of governors.

Where appropriate, the school will inform the LADO [Local Authority Designated Officer] of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

## Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter” or “part of growing up”.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

If a pupil makes an allegation of abuse against another pupil:

- You must tell the DSL and record the allegation, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know that they have a trusted adult in school that they can talk to

- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

## Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure with advice from Child Services and/or the police if necessary.

**Other staff will only talk to parents about any such safeguarding concerns following consultation with the DSL.**

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team and seek their advice.

## Mobile phones and cameras

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. Phones should be switched off or put on silent mode.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

## Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that being released into the public domain does not compromise evidence.

- Timely information sharing is essential to effective safeguarding
- Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests

Staff should only discuss concerns with the DSL, headteacher or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with Data Protection Act 1998 principles.

Safeguarding forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a flash drive, these items should also be kept in locked storage.

Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they should refer the request to the head teacher.

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. The school's policy on confidentiality and information-sharing is available to parents and pupils on request.

## Training

### **All staff**

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding children board.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training, if applicable.

### **The DSL and Deputies**

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

### **Governors**

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

### **Recruitment – interview/appointment panels**

At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

## Domestic Violence and Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

## Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

These are defined as forms of abuse where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity

The imbalance can be due to age, as well as other factors like gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (e.g. increased status) of the perpetrator or facilitator

It can be perpetrated by individuals or groups, males or females, and children or adults.

It can be a one-off occurrence or be a series of incidents over time, and range from opportunistic to complex organised abuse.

It can involve force and/or enticement-based methods of compliance and can involve violence or threats of violence.

Victims can be exploited even when activity appears to be consensual.

It can happen online as well as in person.

Some specific forms of CCE can include:

- children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing.
- They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
  
- Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt.
- They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child sexual exploitation is also sexual abuse; it involves children and young people receiving something, for example accommodation, drugs, gifts or affection, as a result of them performing sexual activities, or having others perform sexual activities on them. It could take the form of grooming of children, e.g. to take part in sexual activities or to post sexual images of themselves on the internet.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening.

Activities may involve physical contact, including penetration of any part of the body, or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late
- Children who regularly miss school

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

Due to the nature of the grooming methods used by their abusers, it is very common for children and young people who are sexually exploited not to recognise that they are being abused.

## Children Missing from Education

A child going missing from education is a potential sign of abuse or neglect, particularly on repeat occasions.

Schools should put in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect and to help prevent the risks of their going missing again.

Schools must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

Refer to Keeping Children Safe in Education September 2020 Appendix A for further guidance.

## County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>103</sup> should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

## Online-Safety

Preston Park has an Online-Safety policy which includes guidance for all pupils in relation to Online-Safety and using the internet and social media. There are appropriate filtering and monitoring systems in place. Staff are encouraged to report their concerns if they believe that children are using the internet, mobile technology or social media inappropriately (e.g. sexting). In some extreme cases the Police may become involved if a child is at risk of exploitation due to their use of the internet or social media. Consequently, staff must report concerns in a timely way so that advice and support can be sought.

## Education at home

Where children are being asked to learn online at home the department has provided advice to support schools and colleges do so safely- [safeguarding-and-remote-education](#).

For further information, see Keeping Children Safe in Education and our online safety policy.

## Sexting

Sexting among children and young people can be a common occurrence, where they often describe these incidents as 'mundane'. Children involved in sexting incidents will be dealt with by the police as victims as opposed to perpetrators, unless there are mitigating circumstances. **The DSL should record all incidents of sexting.** Please report any incidences of sexting, even if you are not sure.

Your responsibilities when responding to an incident:

- If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

- You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13

- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

### **Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents**

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through [a safer schools officer or by dialling 101].

### **Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded on CPOMS.

### **Curriculum coverage**

Pupils are taught about the issues surrounding sexting as part of our relationships education and computing programmes. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on sexting is also shared with pupils, as appropriate, so they are aware of the processes the school will follow in the event of an incident.

## Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

All staff need to maintain an attitude of "it could happen here".

Addressing inappropriate behaviour can help prevent abusive/violent behaviour.

Victims of this abuse will likely find the experience distressing, which can affect their progress in school, this can be made worse if the alleged perpetrator(s) attends the same school.

Staff should be aware that girls are more likely to be victims and boys are more likely to be the perpetrators.

It could be done by a group, not just an individual.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

## What is sexual violence and sexual harassment?

### Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity

but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent.](#)

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

## Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. As set out in [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
  - sharing of unwanted explicit content;
  - upskirting (is a criminal offence);
  - sexualised online bullying;

- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats.

## Children with SEND

Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's impairment without further exploration;
- Assumptions that children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs;
- Communication barriers and difficulties
- Reluctance to challenge carers, (professionals may over empathise with carers because of the perceived stress of caring for a disabled child)
- Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased.
- A disabled child's understanding of abuse.
- Lack of choice/participation and feelings of isolation

## Peer on peer abuse

At Preston Park we recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse (as well as face to face)

Children can abuse their peers online through:

- Abusive, harassing, and misogynistic messages
- Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
- Sharing of abusive images and pornography, to those who don't want to receive such content

All staff should recognise the indicators of peer-on-peer abuse, know how to identify it and respond to reports.

All staff should recognise that peer-on-peer abuse may be taking place, even if not reported.

All staff must understand their role in preventing it and responding to it if they believe a child may be at risk.

All staff should understand the importance of challenging inappropriate behaviours between peers. If they don't, it can create an unsafe environment and lead to a culture that normalises abuse.

Abuse can take place inside and outside of school or online.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol

- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting)

The following applies to all staff:

- You do not need to wait for a child to make a disclosure, you should act on any concerns immediately.
- You may overhear a conversation that suggest a child may have been harmed or a child's behaviour may be an indicator.
- You may confiscate devices for evidence to hand to the police, if the report includes an online element.
- You can ask children outright if they've been harmed and what the nature of the harm was.
- You should keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
- You should reflect back, using the child's language, when hearing a report.
- You should recognise it may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse.

The DSL & safeguarding team will:

- Be aware of, and respond appropriately to all reports and concerns about sexual violence and/or harassment both online and offline, including those that have happened outside of school
- Balance the victim's wishes against your responsibility to protect other children
- Remember that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- Think about other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation, and take the potential for sexual violence and harassment in intimate personal relationships into consideration
- Keep victim and alleged perpetrator(s) a reasonable distance apart on school premises includes at before and after-school activities
- Regularly review the actions you take to respond to reports. In response, update relevant policies with lessons learnt and consider whether there are wider cultural issues at play

- Record all concerns, discussions and decisions made, and the reasons for those decisions, in writing
- Preston Park's response will be underpinned by the principle that "there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated"

If a pupil makes an allegation of abuse against another pupil:

- Report this to the DSL immediately and record the allegation on CPOMS, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL's risk and needs assessment in response to a report of sexual harassment WILL also consider whether there have been any other victims
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
- The DSL will offer all children Place2Be sessions.

We will minimise the risk of peer-on-peer abuse by:

- Provide a developmentally appropriate PSHE curriculum which develops students understanding of acceptable behaviour and keeping themselves safe.
- Have systems in place for any child to raise concerns with staff, knowing that they will be listened to, believed and valued.
- Have relevant policies in place (e.g. behaviour policy).
- Offer a space for children to talk and therapeutic services e.g. Place2Be, Place2talk
- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by highlighting this in assemblies, posters around the school, circle times in class and PSHE lessons.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Peer on peer abuse can manifest itself in many ways and different gender issues can be prevalent. Severe harm may be caused to children by abusive and bullying behaviour of other children, which may be physical, sexual or emotional and can include gender based violence/ sexual assaults, sexting, teenage relationship abuse, peer-on-peer exploitation, serious youth violence, sexual bullying or harmful sexual behaviour.

Should an incident occur, it is essential that all such incidents are treated seriously. The needs of the victim must be addressed, in addition to ensuring that the perpetrator is dealt with in such a way that they acknowledge the seriousness of their action.

Social Services will be informed of all incidents. Parents or carers of both young people will be contacted to give them an opportunity to support their child. It must be remembered that a criminal offence may have been committed and the victim has the right to pursue a complaint against someone who has assaulted them.

## Upskirting is now a form of peer-on-peer abuse

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

## Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are

aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Schools have an important role to play in supporting the mental health and wellbeing of their pupils.

The Governing body should ensure there are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

## Female Genital Mutilation (FGM)

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

FGM involves procedures that include the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons. The practice is medically unnecessary, extremely painful and has serious health consequences, both at the time when the mutilation is carried out and in later life. FGM is against the law except when performed by a registered medical profession on medical or mental health grounds. It is also illegal for someone to arrange for a child to go abroad with the intention of having her circumcised.

Signs of FGM can include:

- Difficulty walking, sitting or standing
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Fracture or dislocation of legs/arms as a result of restraint
- Spend long periods of time away from a classroom during the day with bladder or menstrual problems
- Severe pain in groin area
- Haemorrhage
- Being withdrawn - emotional and psychological shock (exacerbated by having to reconcile being subjected to the trauma by loving parents, extended family and friends); Detached / isolated; extremes of emotion
- Urinary infections
- Change in physical appearance/dress & body language
- Withdrawn aggressive
- Unable to form relationships with adults
- Changes in attitude, personality or behaviour
- Changes in interaction with others
- Feelings shown through writing or art work

- Peer group problems

Any suspicions of a child at risk of having or having had FGM must be reported immediately to the headteacher or DSL. Girls aged 5 to 8 years are most risk.

Any suspicion of FGM having taken place must be reported to the police on 101. If FGM is suspected to be happening now, or to prevent it from happening call 999.

## Serious Violent Crime

A serious violent crime is a crime of violence in which an offender or perpetrator uses or threatens to use force upon a victim. This entails both crimes in which the violent act is the objective, such as murder or rape, as well as crimes in which violence is the means to an end.

All staff need to know the indicators that may signal that children are at risk from, or are involved with, serious violent crime. These include:

- Unexplained gifts or new possessions - these can indicate that children have been approached by or involved with individuals associated with criminal networks or gangs
- Increased absence from school
- Change in friendship or relationships with others or groups
- Significant decline in performance
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries

Staff should also be aware of the associated risks and understand the measures in place to manage them.

Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance 11.

## So-called 'honour-based' abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

## Forced Marriage

A forced marriage is one in which at least one participant does not (or cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a serious abuse of human rights. Whilst it is unlikely that primary-age pupils will be the victims of forced marriage, at Preston Park we are aware that children may disclose that older siblings or parents are at risk.

## Preventing Radicalisation

In 2007 the British government launched its first counter terrorism strategy CONTEST. The CONTEST strategy seeks to counter the threat from terrorism and has four key strands of work,

- **Pursue** - To stop terrorist attacks
- **Prevent** - To stop people becoming terrorists or supporting terror
- **Protect** - To strengthen our protection against a terrorist attack
- **Prepare** - To mitigate the impact of a terrorist attack

In July 2015, the government introduced the Counter Terrorism and Security Act (CTSA) Section 26 of the CTSA places a duty on certain bodies ("specified authorities" listed in schedule 6 of the Act), in the exercise of their functions, to have "*due regard* to the need to prevent people from being drawn into terrorism"

This guidance is issued under section 29 of the Act;

The Act states that the authorities subject to the provisions must have regard to this guidance when carry out the duty. As a specified authority Preston Park Primary School will discharge its responsibility in accordance with the Prevent duty and Ofsted descriptors via this safeguarding policy, prevent delivery plan, and risk assessment, which should be read in conjunction with this policy

We recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability. Staff are expected to uphold and promote the fundamental principles of British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

Our approach will build on the guidance issued by DFE for schools to make explicit our preventative measures to minimise the threat of extremism in our school.

**Radicalisation** is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.

**Extremism** is defined vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We rely on our strong values to steer

our work and ensure the pastoral care of our pupils protects them from exposure to negative influences.

At Preston Park, we have our own internal process in place to effectively respond to all safeguarding issues, including those related to extremism.

We will always adopt an appropriate and proportional response to such issues where DSLs will discuss concerns with the local authority and Prevent police leads to discuss if a referral to the local channel panel is appropriate, and to agree any other actions required to better understand the presenting issues, risks and vulnerabilities to the pupils of concern. Staff must ensure they follow our internal process in the first instance in all cases.

Staff must be fully engaged in being vigilant about radicalisation; that they overcome any disbelief that such issues will not happen at Preston Park and ensure that they work alongside other professional bodies and agencies to ensure that pupils and staff are safe from harm. The principle objectives are that:

- Pupils are encouraged to adopt and live out the school's core values of Respect.
- These complement the key "British Values" of tolerance, respect, understanding, compassion and harmonious living.
- Pupils are helped to understand the importance of democracy and freedom of speech, through SMSC, assemblies and through the elected School Council members.
- Pupils are taught how to keep themselves safe, in school and when using the internet.
- Pupils participate in local community events so that they appreciate and value their neighbours and friends who may not share their faith background.
- Pupil's wellbeing, confidence and resilience is promoted through our planned curriculum and out of hours learning opportunities.
- Pupils are supported in making good choices from a very young age, so they understand the impact and consequences of their actions on others.
- Governors, teachers, teaching assistants and non-teaching staff demonstrate an understanding of what radicalisation and extremism are and why we need to be vigilant in school.

## Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment.

An individual's engagement with the programme is entirely voluntary at all stages.

## Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform Brent local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Preston Park has a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

## The Use of Force to Restrain Pupils

Staff are authorised by the Headteacher to use force, as is reasonable, in circumstances which prevents a pupil from doing, or continuing to do, any of the following:

- committing a criminal offence (including behaving in a way that would be an offence if the pupil were not under the age of criminal responsibility);
- injuring themselves or others;
- causing damage to property (including the pupil's own property);
- engaging in any behaviour prejudicial to maintaining good order and discipline at the school or among any of its pupils, whether that behaviour occurs in a classroom during a teaching session or elsewhere.

There is no legal definition of 'reasonable force' and **in all cases must proportionate and necessary**. The use of force should be a last resort

**The use of force can be regarded as reasonable only if the circumstances of the particular incident warrant it. The degree of force employed must be in proportion to the circumstances of the incident and the seriousness of the behaviour or the consequences it is intended to prevent. Any force used should always be the minimum needed to achieve the desired result.**

Before intervening physically an adult should, wherever practicable, tell the pupil who is misbehaving to stop and what will happen if he or she does not. The adult should continue attempting to communicate with the pupil throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary.

Staff should always avoid touching or holding a pupil in a way that might be considered indecent.

Staff should always try to deal with a situation through other strategies before using force. The possible consequences of intervening physically, including the risk of increasing the disruption or actually provoking an attack, need to be carefully evaluated.

## Whistle blowing and complaints

All staff at Preston Park are aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If necessary, they will speak with the head teacher, the chair of the governing board or with the Local Authority Designated Officer.

Should staff not feel able to raise concerns they can call the NSPCC whistleblowing helpline on 0800 028 028.

## Site Security

All staff members have a responsibility to ensure our buildings and grounds are secure and for reporting concerns that may come to light.

We check the identity of all visitors and volunteers coming into Preston Park. Visitors are expected to sign in and out at the front office and to display a visitor's badge while on the Preston Park site. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

Preston Park will not accept the behaviour of any individual, parent or anyone else, that threatens Preston Park security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the Preston Park site.

The morning procedures at school are that no adults enter the playground. Any access to the school must be made via the front office. In the

afternoon, parents are able to enter the playground and speak to class teachers. However, no parents should enter the building.

## Safer recruitment

Preston Park has robust recruitment and vetting procedures to help prevent unsuitable people from working with children.

Our job advertisements and application packs make explicit reference to the Preston Park's commitment to safeguarding children, including compliance with the Disclosure and Barring Service (DBS) process and clear statements in the job description and person specification about the staff member's safeguarding responsibilities.

All staff members who have contact with children, young people and families will have appropriate pre-employment checks in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and colleges, September 2020*.

At least one member on every short listing and interview panel will have completed safer recruitment training. The head teacher is responsible for ensuring that safer recruitment training is kept up to date.

The head teacher and the nominated governor for child protection are responsible for ensuring that our **single central record** is accurate and up to date.

## Appendix A: The role of the Designated Safeguarding Lead

### **1 MANAGING REFERRALS**

- 1.1 Refer all cases of suspected abuse to Brent Family Front Door and to the Police if a crime may have been committed.
- 1.2 Liaise with the headteacher and safeguarding team about safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.
- 1.3 Act as a source of support, advice and expertise to staff members on matters of child protection and safeguarding.
- 1.4 Liaise with agencies providing early help services and coordinate referrals from Preston Park to targeted early help services for children in need of support. Monitor any cases referred to early help and consider referral to children's services where the situation does not improve.
- 1.5 Should help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children (including those with a social worker) are experiencing, or have experienced, with teachers and other staff.
- 1.6 This could be done by, for example:  
Making sure that staff know who these children are, understand their academic progress and attainment, and maintain a culture of high aspirations for them.
- 1.7 Supporting teaching staff to identify the challenges that children in this group might face, and the additional academic support and adjustments that they could make to best support them.
- 1.8 Refer cases to the Channel programme where there is a radicalisation concern as required.

### **2 RECORD KEEPING/ CPOMS**

- 2.1 Keep written records of child protection in line with LSCB, Brent and school policy.
- 2.2 Ensure a stand-alone file is created as necessary for children with safeguarding concerns.
- 2.3 Maintain a chronology of significant incidents for each child with safeguarding concerns.
- 2.4 Ensure such records are kept confidentially and securely and separate from the child's educational record.

- 2.5 When a child leaves Preston Park, the DSL will make contact with the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school in an appropriately agreed manner.

### **3 INTER-AGENCY WORKING AND INFORMATION SHARING**

- 3.1 Cooperate with Children's Social Care for enquiries under section 47 of the Children Act 1989.
- 3.2 Attend, or ensure other relevant staff members attend, child protection conferences, core group meetings and other multi-agency meetings, as required.
- 3.3 Liaise with other agencies working with the child, share information as appropriate and contribute to assessments.

### **4 TRAINING**

- 4.1 Undertake appropriate training, **updated every year**, and update knowledge and skills.
- 4.2 Ensure each member of staff has access to and understands the Preston Park's safeguarding policy and procedures, including providing induction on these matters to new staff members.
- 4.3 Organise whole-school child protection training for all staff members regularly, and provide updates at least annually. Ensure staff members who miss the training receive it by other means.
- 4.4 Ensure Preston Park allocates time and resources every year for relevant staff members to attend training.
- 4.5 Encourage a culture of listening to children and taking account of their wishes and feelings in any action the school takes to protect them.
- 4.6 Maintain accurate records of staff induction and training.

### **5 AWARENESS RAISING**

- 5.1 Review the safeguarding and child protection policy and procedures annually and liaise with Preston Park's governing body to update and implement them.
- 5.2 Make the safeguarding and child protection policy and procedures available publicly and raise awareness of parents that referrals about suspected abuse may be made and the role of the school in any investigations that ensue
- 5.3 Provide updates to the staff on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews, at least annually.

## **6 QUALITY ASSURANCE**

- 6.1 Monitor the implementation of and compliance with policy and procedures, including periodic audits of child protection and welfare concerns files (at a minimum once a year).
- 6.2 Provide regular reports, to the governing body detailing changes and reviews to policy, training undertaken by staff members and the number of children with child protection plans and other relevant data.
- 6.3 Take lead responsibility for remedying any deficiencies and weaknesses identified in child protection arrangement

### **a. PROCEDURE FOR MANAGING ALLEGATIONS OF ABUSE MADE AGAINST PRESTON PARK STAFF MEMBERS, SUPPLY STAFF AND VOLUNTEERS**

- b. Our aim is to provide a safe and supportive environment which secures the well-being and very best outcomes for the children at Preston Park. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.
- c. In some cases you may have to consider an allegation against someone not directly employed by you, where your usual disciplinary procedures don't fully apply, like supply staff provided by an agency.
- d. You should make sure allegations are dealt with properly, and you shouldn't decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with your LADO to determine a suitable outcome.
- e. Governing boards should discuss with the agency whether it's appropriate to suspend the supply teacher, or redeploy them to another part of the school, while they carry out their investigation.
- f. Agencies should be fully involved and co-operate in any enquiries, but your school will usually take the lead as the agency won't be able to collect the necessary information.
- g. The allegations management meeting should address issues such as information sharing, to ensure previous concerns or allegations known to the agency are taken into account.
- h. When using an agency, you should inform them of your process for managing allegations, including inviting the agency's HR manager or equivalent to meetings and keeping them up to date with information about your policies.
- i. Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

- j. We will take all possible steps to safeguard our children and to ensure that the adults at Preston Park are safe to work with children. We will always ensure that the procedures outlined in Part 4 of Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges September 2020 are adhered to.
- k. If an allegation is made or information is received about an adult who works in our setting which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the Headteacher immediately. Should an allegation be made against the Headteacher, this will be reported to the Chair of Governors. In the event that neither the Headteacher nor Chair of Governors are not contactable on that day, the information must be passed to and dealt with by the Deputy Headteachers or the Vice Chair of Governors.
- l. Preston Park has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at Preston Park, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

**These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education, September 2020.**

## Appendix B: Specific forms of abuse and safeguarding issues

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. When alerted to such incidents in the vicinity, Preston Park will make families of Preston Park aware.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Preston Park provide outdoor-safety lessons run by teachers or by local police staff.

### **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](https://www.gov.uk))

## Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,130
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

## Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children’s social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act

Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

## Appendix C: safer recruitment and DBS checks – Policy and Procedures

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### **Appointing new staff**

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children

- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

We will obtain a copy of the enhanced Disclosure and Barring Service (DBS) check from the agency where it disclosed any "matter or information" or "any information was provided to the employment business".

The agency or third party must obtain the enhanced DBS certificate with barred list information (where this is required) for agency and third party staff, prior to appointing the individual.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- Check ID and be assured that the visitor has had the appropriate DBS check, for visitors attending in a professional capacity

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

### **Governors**

- All governors will have an enhanced DBS check without barred list information and section 128 check. They will have an enhanced DBS check with barred list information if working in regulated activity.

## Appendix D: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### **Suspension**

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority.

### **Definitions for outcomes of allegation investigations**

- **Substantiated:** there is sufficient evidence to prove the allegation

- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

### **Procedure for dealing with allegations**

The role of Local Authority Designated Officer (LADO) is crucial in handling all allegations of this kind. The LADO has the responsibility to ensure that allegations about abuse are handled properly and expeditiously.

The key points for head teachers/Chair of Governors/Management Committee to follow are:

- a) Inform the LADO **within one working day** of any allegation that comes to the school's attention that meets the criteria as mentioned in section 2 of LSCB procedures.
- b) When informed of the concern or allegation, no attempt should be made by Head Teacher/Chair of Governors/Management Committee to investigate the matter or interview the member of staff concerned or potential witnesses.
- c) If the matter is referred to a multi agency meeting, the School should continue to take no action, unless advised to do so.
- d) If the matter is handed back to the school, whether at the first strategy meeting or at some later stage, the School must take account of the recommendations of the strategy meeting and must liaise with the LADO about the next steps.
- e) To liaise with schools HR team in these instances

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

Where the police are involved, wherever possible the governing board will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

### **Confidentiality**

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer. The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

### **References**

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

### **Learning lessons**

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future. This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

Please refer to the Brent guidance to Disciplinary Policy and Procedure for Schools' for a detailed outline of the process.